



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 6, 2018

ALEXANDRA ROJAS, TREASURER
JUSTICE DEMOCRATS
P.O. BOX 910
KNOXVILLE, TN 37901

Response Due Date
01/10/2019

IDENTIFICATION NUMBER: C00630665

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2018 - 09/30/2018)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in enforcement action.** Additional information is needed for the following 6 item(s):

1. The totals listed on Lines 15 and 17, Column B of the Detailed Summary Page appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))
2. Schedule A of your report discloses aggregate year to date totals for contributions received from individuals which appear to be incorrect (see attached). Please be advised that federal regulations require aggregate year to date totals to include only those contributions which are received during the calendar year. In the event that the aggregate year to date total is correct, please note that federal regulations also require the disclosure of all contributions received from individuals who have contributed over \$200. 11 CFR §104.3(a)(4) Please amend your report to provide the correct aggregate year to date totals.
3. Schedule A supporting Line 15 of your report discloses offsets to operating expenditures totaling \$53,401.28 (see attached); however, your report(s) does not appear to disclose disbursements to these entities. Please provide clarifying information regarding this activity and amend your report(s) if necessary. (11 CFR § 104.3(a) & (b))

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4. Your report discloses a negative entry on Line 21(b) with a purpose "Operating Costs moved to Line 23 as in-kind contributions" and corresponding positive disbursements for "Inkind of Communications Software," "Inkind of Operating Costs paid on behalf of Committee," "Inkind of Relay Text Messaging," and "Inkind of Web Hosting" disclosed on Line 23. Please be advised that offsetting negative entries on Line 21(b) should only be disclosed when reporting in-kind contributions of committee-owned assets (see attached for further guidance on reporting in-kind contributions to federal candidates). Please provide further clarifying information or amend your report to properly disclose the in-kind activity.

5. Schedule D of your report discloses several credits for debts owed by "Bernal Alto LLC" and "CORI BUSH 2018." Please provide further clarification regarding these credits.

6. Schedule D of your report discloses several credits for debts owed by federal candidates with purposes of "Debt forgiven as in-kind contributions to candidate reported on Line 23" which have not been recorded on a disbursement schedule. Debt payments must be reflected on a Schedule B, E, or H4 as well as on Schedule D. Please amend your report to clarify this discrepancy. (52 U.S.C. §30104(b)(5)(D) and (b)(8) (formerly 2 U.S.C. §434(b)(5)(D) and (b)(8)))

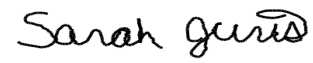
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

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Sincerely,

A handwritten signature in black ink that reads "Sarah Juris". The script is cursive and fluid, with the first name "Sarah" and last name "Juris" clearly distinguishable.

Sarah Juris
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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Aggregate Year-to-Date Total Calculated Incorrectly
JUSTICE DEMOCRATS (C00630665)

Contributor Name	Date	Amount	Reported YTD Total	YTD Total Calculated by FEC
Geidel, Rich	7/22/18	\$250.00	\$4,100.00	\$5,850.00

Offsets to Operating Expenditures with No Previous Disbursements
JUSTICE DEMOCRATS (C00630665)

Offsets to Operating Expenditures

Name	Date	Amount
ALEXANDRIA OCASIO-CORTEZ 2018	7/5/18	\$145.25
ALEXANDRIA OCASIO-CORTEZ 2018	7/5/18	\$388.58
ALEXANDRIA OCASIO-CORTEZ 2018	7/5/18	\$709.85
ALEXANDRIA OCASIO-CORTEZ 2018	7/5/18	\$85.91
ALEXANDRIA OCASIO-CORTEZ 2018	8/10/18	\$21,714.13
ALEXANDRIA OCASIO-CORTEZ 2018	8/27/18	\$1,720.86
ALEXANDRIA OCASIO-CORTEZ 2018	9/21/18	\$1,304.08
ALISON HARTSON 2018	8/31/18	\$111.40
ANTOINETTE SEDILLO LOPEZ FOR CONGRESS	7/5/18	\$28.58
ANTOINETTE SEDILLO LOPEZ FOR CONGRESS	7/5/18	\$383.92
ANTOINETTE SEDILLO LOPEZ FOR CONGRESS	7/5/18	\$1,703.11
Bernal Alto LLC	8/14/18	\$12,099.44
BRYAN CAFORIO FOR CONGRESS	7/4/18	\$330.05
Chardo Richardson 2018	9/21/18	\$731.95
Chardo Richardson 2018	9/21/18	\$422.49
Chardo Richardson 2018	9/21/18	\$310.26
EDWARDS FOR PA	7/5/18	\$363.50
FRIENDS OF JESS KING	7/31/18	\$1,792.84
High, Kristal	7/13/18	\$852.06
KERRI EVELYN HARRIS FOR DELAWARE	8/15/18	\$3,000.00
KERRI EVELYN HARRIS FOR DELAWARE	9/17/18	\$3,000.00
SAIRA FOR CONGRESS	7/17/18	\$299.02
State of Florida Department of Financial Services	7/27/18	\$315.00
State of Florida Department of Financial Services	9/17/18	\$189.00
Sterchi Lofts LLC	7/13/18	\$1,400.00

Campaign Guide for Nonconnected Committees

IN-KIND CONTRIBUTIONS TO CANDIDATES

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		FOR LINE NUMBER: (check only one)		PAGE 1 OF 1	
Use separate schedule(s) for each category of the Detailed Summary Page		<input checked="" type="checkbox"/> 21b <input type="checkbox"/> 22 <input type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 29 <input type="checkbox"/> 30b			
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.					
NAME OF COMMITTEE (In Full) Civil Republic PAC					
Full Name (Last, First, Middle Initial)					
A. Westroads Liquor			Date of Disbursement MM / DD / YYYY 08 / 26 / 2008		
Mailing Address 19 Main Street					
City City			State ST		
Zip Code 00000					
Purpose of Disbursement Reception			Category/ Type 011		
Candidate Name Stephen Bagwell			Amount of Each Disbursement this Period 972.40		
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President			Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
State: ST			District: 08		
MEMO: In-kind: See Schedule B, Line 23					

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		FOR LINE NUMBER: (check only one)		PAGE 1 OF 1	
Use separate schedule(s) for each category of the Detailed Summary Page		<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 29 <input type="checkbox"/> 30b			
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.					
NAME OF COMMITTEE (In Full) Civil Republic PAC					
Full Name (Last, First, Middle Initial)					
A. Westroads Liquor			Date of Disbursement MM / DD / YYYY 08 / 24 / 2008		
Mailing Address 19 Main Street					
City City			State ST		
Zip Code 00000					
Purpose of Disbursement Reception			Category/ Type 011		
Candidate Name Stephen Bagwell			Amount of Each Disbursement this Period 972.40		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President			Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
State: ST			District: 08		
In-kind					

and indicate the report on which the original contribution was itemized.

In the illustration on the next page, a nonconnected committee originally made a \$10,000 contribution to a candidate's campaign, intending half of it to count toward the general election. The nonconnected committee itemized the contribution in its April quarterly report. The following month, the campaign requested that the committee redesignate the excessive \$5,000 for the general election campaign. The nonconnected committee then itemized the redesignation in its July quarterly report.

Memo Entry

Use a memo entry on a schedule to provide information that is not included in the schedule's total dollar figure. Memo entries are used, for example, to disclose the redesignation of a contribution.

Filers should exercise caution not to confuse "memo entries" with the "memo text" function used to supply additional information when filing electronically using FECFile.

Additional Information on Candidates

Further information is required when itemizing a contribution to a candidate committee on Schedule B. List the candidate's name and the office sought (including the state and, if applicable, Congressional district). When itemizing a contribution or loan to a candidate committee, specify the election for which the payment was made by checking the appropriate category in the election designation box. 104.3(b)(3)(v). See illustrations above.

Redesignations of Contributions

Use memo entries to show any redesignations of contributions.

If a contribution to a candidate is redesignated for a different election after the close of books for the reporting period during which the contribution was made, show the redesignation on the next report